BEFORE THE BOARD OF REGISTERED NURSING DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA

3 5

8

9

10

11

12

1

2

In the Matter of the Statement of Issues Against:

Case No. 2008-129

GLENDA SHERRY PEVETO a.k.a. GLENDA SHERRY FORBITO PEVETO

1865 Herndon Avenue, Suite K, #358 Clovis, California 93611,

Respondent.

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in this matter.

13

This Decision shall become effective on May 9, 2008

15

14

IT IS SO ORDERED _____April 9, 2008

16

17

18

19

20

21

22 23

24

25

26 27

28

DEPARTMENT OF CONSUMER AFFAIRS

1	
2	ALFREDO TERRAZAS
3	
4	Supervising Deputy Attorney General
5	1300 I Street, Suite 125
6	Sacramento, CA 94244-2550
7	Facsimile: (916) 324-5567
	Attorneys for Complainant
8	BEFORE THE
9 10	BOARD OF REGISTERED NURSING DEPARTMENT OF CONSUMER AFFAIRS
11	STATE OF CALIFORNIA
	In the Matter of the Statement of Issues Against: Case No. 2008-129
12	GLENDA SHERRY PEVETO a.k.a. GLENDA SHERRY FORBITO PEVETO 1865 Herndon Avenue Suite K. #250
13	1865 Herndon Avenue, Suite K, #358 Clovis, California 93611, AND DISCIPLINARY ORDER
14	Respondent.
15	
16	IT IS HEREBY STIPULATED AND AGREED by and between the parties to the
17	above-entitled proceedings that the following matters are true:
18	<u>PARTIES</u>
19	1. Ruth Ann Terry, M.P.H., R.N. (Complainant), is the Executive Officer of
20	the Board of Registered Nursing. She brought this action solely in her official capacity and is
21	represented in this matter by Edmund G. Brown Jr., Attorney General of the State of California,
22	by Arthur D. Taggart, Supervising Deputy Attorney General.
23	2. Respondent Glenda Sherry Forbito Peveto is representing herself in this
24	proceeding and has chosen not to exercise her right to be represented by counsel.
25	3. On or about April 30, 2007, Respondent filed an application with the
26	Board of Registered Nursing to obtain a Registered Nurse License.
- 11	///
	///
- 11	

JURISDICTION

28 ///

///

4. Statement of Issues No. 2008-129 was filed before the Board of Registered Nursing (Board), Department of Consumer Affairs, and is currently pending against Respondent. The Statement of Issues and all other statutorily required documents were properly served on Respondent on October 17, 2007. Respondent timely filed her Notice of Defense contesting the Statement of Issues. A copy of Statement of Issues No. 2008-129 is attached as exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

- 5. Respondent has carefully read, and understands the charges and allegations in Statement of Issues No. 2008-129. Respondent has also carefully read, and fully understands the effects of this Stipulated Settlement and Disciplinary Order.
- 6. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Statement of Issues; the right to be represented by counsel at her own expense; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.
- 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

CULPABILITY

- 8. Respondent admits the truth of each and every charge and allegation in Statement of Issues No. 2008-129.
- 9. Respondent agrees that her Registered Nurse License application is subject to denial and she agrees to be bound by the Board of Registered Nursing (Board) 's imposition of discipline as set forth in the Disciplinary Order below.

///

CONTINGENCY

- Nursing. Respondent understands and agrees that counsel for Complainant and the staff of the Board of Registered Nursing may communicate directly with the Board regarding this stipulation and settlement, without notice to or participation by Respondent. By signing the stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order shall be of no force or effect, except for this paragraph; it shall be inadmissible in any legal action between the parties; and the Board shall not be disqualified from further action by having considered this matter.
- 11. The parties understand and agree that facsimile copies of this Stipulated Settlement and Disciplinary Order, including facsimile signatures thereto, shall have the same force and effect as the originals.

DISCIPLINARY ORDER

In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Disciplinary Order:

IT IS HEREBY ORDERED:

The application of Respondent GLENDA SHERRY PEVETO a.k.a. GLENDA SHERRY FORBITO PEVETO for licensure is hereby granted, and a license shall be issued to Respondent upon successful completion of all licensing requirements. Said license shall immediately be revoked, the order of revocation stayed and respondent placed on probation for a period of two (2) years on the following conditions:

Severability Clause. Each condition of probation contained herein is a separate and distinct condition. If any condition of this Order, or any application thereof, is declared unenforceable in whole, in part, or to any extent, the remainder of this Order, and all other

13

12

14 15

16 17

18

20 21

23

24

22

25 26

27

28

19 restored. 3.

applications thereof, shall not be affected. Each condition of this Order shall separately be valid and enforceable to the fullest extent permitted by law.

1. Obey All Laws. Respondent shall obey all federal, state and local laws. A full and detailed account of any and all violations of law shall be reported by Respondent to the Board in writing within seventy-two (72) hours of occurrence. To permit monitoring of compliance with this condition, Respondent shall submit completed fingerprint forms and fingerprint fees within 45 days of the effective date of the decision, unless previously submitted as part of the licensure application process.

Criminal Court Orders: If Respondent is under criminal court orders, including probation or parole, and the order is violated, this shall be deemed a violation of these probation conditions, and may result in the filing of an accusation and/or petition to revoke probation.

2. Comply with the Board's Probation Program. Respondent shall fully comply with the conditions of the Probation Program established by the Board and cooperate with representatives of the Board in its monitoring and investigation of the Respondent's compliance with the Board's Probation Program. Respondent shall inform the Board in writing within no more than 15 days of any address change and shall at all times maintain an active, current license status with the Board, including during any period of suspension.

Upon successful completion of probation, Respondent's license shall be fully

Report in Person. Respondent, during the period of probation, shall appear in person at interviews/meetings as directed by the Board or its designated representatives.

4. Residency, Practice, or Licensure Outside of State. Periods of residency or practice as a registered nurse outside of California shall not apply toward a reduction of this probation time period. Respondent's probation is tolled, if and when she resides outside of California. Respondent must provide written notice to the Board within 15 days of any change of residency or practice outside the state, and within 30 days prior to re-establishing residency or returning to practice in this state.

Respondent shall provide a list of all states and territories where she has ever been licensed as a registered nurse, vocational nurse, or practical nurse. Respondent shall further provide information regarding the status of each license and any changes in such license status during the term of probation. Respondent shall inform the Board if she applies for or obtains a new nursing license during the term of probation.

5. **Submit Written Reports.** Respondent, during the period of probation, shall submit or cause to be submitted such written reports/declarations and verification of actions under penalty of perjury, as required by the Board. These reports/declarations shall contain statements relative to Respondent's compliance with all the conditions of the Board's Probation Program. Respondent shall immediately execute all release of information forms as may be required by the Board or its representatives.

Respondent shall provide a copy of this Decision to the nursing regulatory agency in every state and territory in which she has a registered nurse license.

6. Function as a Registered Nurse. Respondent, during the period of probation, shall engage in the practice of registered nursing in California for a minimum of 24 hours per week for 6 consecutive months or as determined by the Board.

For purposes of compliance with the section, "engage in the practice of registered nursing" may include, when approved by the Board, volunteer work as a registered nurse, or work in any non-direct patient care position that requires licensure as a registered nurse.

The Board may require that advanced practice nurses engage in advanced practice nursing for a minimum of 24 hours per week for 6 consecutive months or as determined by the Board.

If Respondent has not complied with this condition during the probationary term, and Respondent has presented sufficient documentation of her good faith efforts to comply with this condition, and if no other conditions have been violated, the Board, in its discretion, may grant an extension of Respondent's probation period up to one year without further hearing in order to comply with this condition. During the one year extension, all original conditions of probation shall apply.

7. **Employment Approval and Reporting Requirements.** Respondent shall obtain prior approval from the Board before commencing or continuing any employment, paid or voluntary, as a registered nurse. Respondent shall cause to be submitted to the Board all performance evaluations and other employment related reports as a registered nurse upon request of the Board.

Respondent shall provide a copy of this Decision to her employer and immediate supervisors prior to commencement of any nursing or other health care related employment.

In addition to the above, Respondent shall notify the Board in writing within seventy-two (72) hours after she obtains any nursing or other health care related employment. Respondent shall notify the Board in writing within seventy-two (72) hours after she is terminated or separated, regardless of cause, from any nursing, or other health care related employment with a full explanation of the circumstances surrounding the termination or separation.

8. **Supervision.** Respondent shall obtain prior approval from the Board regarding Respondent's level of supervision and/or collaboration before commencing or continuing any employment as a registered nurse, or education and training that includes patient care.

Respondent shall practice only under the direct supervision of a registered nurse in good standing (no current discipline) with the Board of Registered Nursing, unless alternative methods of supervision and/or collaboration (e.g., with an advanced practice nurse or physician) are approved.

Respondent's level of supervision and/or collaboration may include, but is not limited to the following:

- (a) Maximum The individual providing supervision and/or collaboration is present in the patient care area or in any other work setting at all times.
- (b) Moderate The individual providing supervision and/or collaboration is in the patient care unit or in any other work setting at least half the hours Respondent works.

28 ///

- (c) Minimum The individual providing supervision and/or collaboration has person-to-person communication with Respondent at least twice during each shift worked.
- (d) Home Health Care If Respondent is approved to work in the home health care setting, the individual providing supervision and/or collaboration shall have person-to-person communication with Respondent as required by the Board each work day. Respondent shall maintain telephone or other telecommunication contact with the individual providing supervision and/or collaboration as required by the Board during each work day. The individual providing supervision and/or collaboration shall conduct, as required by the Board, periodic, on-site visits to patients' homes visited by Respondent with or without Respondent present.
- 9. **Employment Limitations.** Respondent shall not work for a nurse's registry, in any private duty position as a registered nurse, a temporary nurse placement agency, a traveling nurse, or for an in-house nursing pool. However, Respondent shall be permitted to fulfill the terms of a contract for traveling nurse services until such contract expires in January of 2008. Upon expiration of her contract in January 2008, she will be obliged to comply fully and completely with the terms of paragraph 9 of this stipulated settlement, in accordance with the other terms in the settlement.

Respondent shall not work for a licensed home health agency as a visiting nurse unless the registered nursing supervision and other protections for home visits have been approved by the Board. Respondent shall not work in any other registered nursing occupation where home visits are required.

Respondent shall not work in any health care setting as a supervisor of registered nurses. The Board may additionally restrict Respondent from supervising licensed vocational nurses and/or unlicensed assistive personnel on a case-by-case basis.

Respondent shall not work as a faculty member in an approved school of nursing or as an instructor in a Board approved continuing education program.

Respondent shall work only on a regularly assigned, identified and predetermined worksite(s) and shall not work in a float capacity.

If Respondent is working or intends to work in excess of 40 hours per week, the Board may request documentation to determine whether there should be restrictions on the hours of work.

10. **Complete a Nursing Course(s).** Respondent, at her own expense, shall enroll and successfully complete a course(s) relevant to the practice of registered nursing no later than six months prior to the end of her probationary term.

Respondent shall obtain prior approval from the Board before enrolling in the course(s). Respondent shall submit to the Board the original transcripts or certificates of completion for the above required course(s). The Board shall return the original documents to Respondent after photocopying them for its records.

11. **Violation of Probation.** If Respondent violates the conditions of her probation, the Board after giving Respondent notice and an opportunity to be heard, may set aside the stay order and impose the stayed discipline (revocation/suspension) of Respondent's license.

If during the period of probation, an accusation or petition to revoke probation has been filed against Respondent's license or the Attorney General's Office has been requested to prepare an accusation or petition to revoke probation against Respondent's license, the probationary period shall automatically be extended and shall not expire until the accusation or petition has been acted upon by the Board.

12. **License Surrender.** During Respondent's term of probation, if she ceases practicing due to retirement, health reasons or is otherwise unable to satisfy the conditions of probation, Respondent may surrender her license to the Board. The Board reserves the right to evaluate Respondent's request and to exercise its discretion whether to grant the request, or to take any other action deemed appropriate and reasonable under the circumstances, without further hearing. Upon formal acceptance of the tendered license and wall certificate, Respondent will no longer be subject to the conditions of probation.

Surrender of Respondent's license shall be considered a disciplinary action and shall become a part of Respondent's license history with the Board. A registered nurse whose

28 ///

1	license has been surrendered may petition the Board for reinstatement no sooner than the
2	following minimum periods from the effective date of the disciplinary decision:
3	(1) Two years for reinstatement of a license that was surrendered for any
4	reason other than a mental or physical illness; or
5	(2) One year for a license surrendered for a mental or physical illne s.
6	13. Concurrent Probation Provision. Respondent is subject to concurrent
7	disciplinary order(s) from the Louisiana Board of Nursing. If Respondent violates the order(s),
8	this shall be deemed a violation of probationary conditions imposed by the Board, and may result
9	in the filing of an Accusation and Petition to Revoke Probation.
10	ACCEPTANCE
11	I have carefully read the Stipulated Settlement and Disciplinary Order. I
12	understand the stipulation and the effect it will have on my Registered Nurse License. I
13	understand I have a right to retain private counsel at my own expense. I have decided to
14	represent myself in these proceedings. I enter into this Stipulated Settlement and Disciplinary
15	Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order
16	of the Board of Registered Nursing.
17	DATED: 11-7-07
18	
19	Genda Shung
20	GLENDA SHERRY PEVETO Ek.a. GLENDA SHERRY FORBITO PEVETO
21	Respondent/Applicant
22	///
23	///
24	///
25	///
26	///
27	

11

ENDORSEMENT

submitted for consideration by the Board of Registered Nursing of the Department of Consumer

November E, 2007

Affairs.

DOJ Matter ID: SA2007102388

EDMUND G. BROWN JR., Attorney General of the State of California

ARTHUR D. TAGGART

Supervising Deputy Attorney General

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully

Attorneys for Complainant

Exhibit A

Statement of Issues No. 2008-129

1	The state of the s
2	of the State of California ARTHUR D. TAGGART, State Bar No. 083047 Supervising Deputy Attorney General
3	California Department of Justice 1300 I Street, Suite 125
4	
5	
6	Attorneys for Complainant
7	
8	
9	BEFORE THE BOARD OF REGISTERED NURSING
10	DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA
11	
12	
13	In the Matter of the Statement of Issues Against: Case No. 2008 - 129
14 15	GLENDA SHERRY PEVETO, aka GLENDA SHERRY FORBITO PEVETO 1865 Herndon Avenue, Suite K, #358 STATEMENT OF ISSUES
16	Clovis, California 93611
17	Applicant/Respondent.
18	Ruth Ann Terry, M.P.H, R.N ("Complainant") alleges:
19	<u>PARTIES</u>
20	1. Complainant brings this Statement of Issues solely in her official capacity
21	as the Executive Officer of the Board of Registered Nursing ("Board"), Department of Consumer
22	Affairs.
23	Application History
24	2. On or about April 30, 2007, the Board received an Application for
25	Licensure by Endorsement for a registered nurse license from Glenda Sherry Peveto, also known
26	as Glenda Sherry Forbito Peveto ("Respondent"). On or about April 16, 2007, Respondent
27	certified under penalty of perjury to the truthfulness of all statements, answers, and

representations in the application. The Board denied the application on April 27, 2007.

///

<u>PRAYER</u>

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

- 1. Denying the application of Glenda Sherry Peveto, also known as Glenda Sherry Forbito Peveto for a registered nurse license; and,
 - 2. Taking such other and further action as deemed necessary and proper.

DATED: 10/12/07

RUTH ANN TERRY, M.P.H., R.N

Executive Officer

Board of Registered Nursing Department of Consumer Affairs

State of California Complainant

SA2007102388 10379603.wpd

EXHIBIT A Louisiana Board's Consent Order

Louis na State Board of Nu ing

5207 Essen Lane, Suite 6 Baton Rouge, LA 70809

Telephone: (225) 763-3570 or (225) 763-3577 Fax: (225) 763-3580

http://www.lsbn.state.la.us

Certified Mail Return Receipt Requested

May 8, 2007

Ms. Glenda Forbito Peveto 104 Westland Place West Monroe, LA 71291

Dear Ms. Peveto:

Reference is to the Consent Order with the Board effective February 27, 2007. This order allowed that your Louisiana RN license be suspended, with a stay of suspension, contingent upon stipulations. The Order stipulated, in part, that you:

- Prior to returning to work, inform all nursing employers of these disciplinary measures and of the probationary status of license. Within two weeks, shall cause all employers to submit, in writing to the Board, that they have reviewed this Order.
- □ Work in a restrictive environment as a member of a treatment team rather than alone or with a few employees. Not be employed in agency/pool/staffing, home health services, or nursing homes. Additionally, not be employed in any unsupervised setting. Must be directly supervised by an on-site supervisor May continue working through an agency through long term contract(s).

A review of your file reveals that you are not in compliance with the aforementioned Order, specifically, on April 25, 2007 the Louisiana State Board of Nursing was advised that you failed to notify your employer, St. Francis Medical Center, of the Consent Order effective February 27, 2007 prior to returning to work. In addition, the Board of Nursing received information that you are working as a "PRN pool nurse" for St. Francis Medical Center which is prohibited according to the consent order.

The order further states that failure to comply with the stipulations, or receipt of an unfavorable report shall result in the immediate suspension of your license. Therefore, your Louisiana RN license is suspended and you are hereby directed to return your 2007 RN license to the Board of Nursing.

YOU ARE TO CEASE AND DESIST IMMEDIATELY THE PRACTICE OF NURSING IN LOUISIANA.

If you are able to show error in the staff's action then you must so notify the Board in writing within ten (10) days of this date.

LOUISIANA STATE BOARD OF NURSING

South of Mill count

Barbara L. Morvant, MN, RN

Executive Director

cc: Christine Kipp, V.P., Patient Care Services

St. Francis Medical Center

LOUISIANA STATE BOARD OF NURSING BATON ROUGE, LOUISIANA

IN THE MATTER OF:
GLENDA SHERRY FORBITO PEVETO
104 WESTLAND PLACE
WEST MONROE, LA 71291
Respondent

CONSENT ORDER

TERMS AGREED TO BY LICENSEE

I, GLENDA SHERRY FORBITO PEVETO, voluntarily agree to sign and have witnessed the terms of agreements for the purpose of avoiding a formal administrative hearing with the Louisiana State Board of Nursing.

I, GLENDA SHERRY FORBITO PEVETO, say that I freely, knowingly and voluntarily entered into this agreement; that I understand that I have a right to a hearing in this matter and I freely waive such right; and that I understand that I have a right to legal counsel prior to entering into this agreement.

I acknowledge that the Louisiana State Board of Nursing makes the following FINDINGS OF FACT:

- 1. On May 11, 2001, Respondent was licensed as a Registered Nurse in Louisiana by examination
- On September 26, 2005, Respondent, as owner and operator of Faces, etc., injected a client
 with Restylane and Botox, without supervision of a physician. The client had not been seen
 by the physician.
- The client developed from necrosis and ulcerations from the Restylane injections and ptosis
 of the eyebrows and upper eyelids secondary to the Botox injections.
- 4. On November 6, 2006, Respondent signed a "Stipulation and Consent to Judgment" with the Louisiana State Board of Medical Examiners and pursuant the stipulation, the Fourth Judicial District Court for the Parish of Ouachita, State of Louisiana, entered a judgment on December 8, 2006 which provided:

"Considering the Petition for Preliminary and Permanent Injunction filed herein by petitioner, the Louisiana State Board of Medical Examiners, and the Stipulation and Consent to Judgment filed herein by the defendant, Sherry Peveto, R.N., and the court considering that Ms. Peveto has voluntarily agreed to refrain from the practices that gave rise to the petition for injunction, while maintaining and asserting that she has not violated the law in any respect; accordingly.

IT IS ORDERED, ADJUDGED AND DECREED that Sherry Peveto, R.N. shall not, individually, or through the business, Faces, Etc. of Monroe, or otherwise, engage, undertake to engage, or hold herself out to engage in the practice of medicine in any form in the state of Louisiana, including, without limitation, the performance of botox injections, collagen/restylane injections, microdermabrasion, weight loss treatments, chemical face peels, and leg vein and hair removal and all other procedures using medical lasers (including Intense Pulsed Light), unless such procedures and/or treatments are performed under the supervision of a physician licensed to practice medicine in this state ("licensed physician") who is physically present on the premises, following an examination of the patient by the licensed physician to determine whether the procedure or treatment is indicated for the patient, and where the licensed physician is available on the premises when the procedure and /or treatment is performed to address any complications and to provide any follow-up care that may be needed; or unless and until such time that Ms. Peveto possesses a license to practice medicine in the State of Louisiana.



LOUISIANA STATE BOARD OF NURSING BATON ROUGE, LOUISIANA

IN THE MATTER OF:

GLENDA SHERRY FORBITO PEVETO

104 WESTLAND PLACE

WEST MONROE. LA 71291

Respondent

CONSENT ORDER

TERMS AGREED TO BY LICENSEE (Cont'd)

Rendered at Monroe, Louisiana, this 8th day of December, 2006" Signed by Fourth Judicial District Judge.

To facilitate submission of this Consent Order, I do not offer any defense to the FINDINGS OF FACT. I agree that the Board has jurisdiction of this matter pursuant to L.R.S. 37:911 et seq. I admit to the findings of fact and agree that there is sufficient evidence upon which to predicate a finding of violation of the provisions of L.R.S. 37:921. I agree that the Board may treat the allegations of fact and law as true, which finding shall have the same force and effect as if evidence and argument were presented in support of the allegations and, based thereon, the Board found the allegations to be true. I specifically waive my right to contest these findings in any subsequent proceedings before the Board. I understand that this Consent Order shall constitute a public record and is disciplinary action by the Board. I understand that this will be reported as Practicing Beyond Scope.

In order to avoid further administrative proceedings, I hereby consent to accept and abide by the following ORDER of the Board:

The license of this registrant is suspended, with a stay of the said suspension, and that the license is probated for a minimum of eighteen (18) months, with the following stipulations.

- 1. Within three (3) days upon receipt of this Order, send RN license to the Board office so that the license can be marked "probated".
- Prior to returning to work, inform all nursing employers of these disciplinary measures and of the
 probationary status of license. Within two weeks, shall cause all employers to submit, in writing to the
 Board, that they have reviewed this Order.
- 3. Work in a restrictive environment as a member of a treatment team rather than alone or with a few employees. Not be employed in agency/pool/staffing, home health services, or nursing homes. Additionally, not be employed in any unsupervised setting. Must be directly supervised by an on-site supervisor. May continue working through an agency through long term contract(s).
- 4. Immediately (within 72 hours) inform the Board in writing of any change in address.
- 5. If employed in nursing, immediately inform the Board in writing of all places of employment. If employment changes, the Board shall be immediately (within 72 hours) notified in writing.
- 6. If unemployed or employed in a non-nursing position, inform the Board in writing on a quarterly basis.
- 7. During the period of probation, Respondent shall engage in the practice of professional nursing for a minimum of twenty four (24) hours per week for a minimum of twelve (12) consecutive months.
- 8. Have all immediate supervisors submit a performance evaluation report quarterly, commencing from the first date of employment.
- 9. Within ninety (90) days, submit payment of \$200.00 to the Board as cost of this consent order.
- 10. Within ninety (90) days, submit payment of \$500.00 fine to the Board.



LOUISIANA STATE BOARD OF NURSING BATON ROUGE, LOUISIANA

IN THE MATTER OF: GLENDA SHERRY FORBITO PEVETO 104 WESTLAND PLACE WEST MONROE, LA 71291

Respondent

CONSENT ORDER

TERMS AGREED TO BY LICENSEE (Cont'd)

- 11. By the first of each month, submit a monthly probation fee of twenty-five dollars (\$25.00) to the Board.
- 12. Not have any misconduct, criminal violations or convictions, or violations of any health care regulations reported to the Board related to this or any other incidents.
- 13. Quarterly reports are due on or before the first day of January, April, July, and October. Monthly reports are due on the first day of each month.
- 14. Submit certified copies of all resolutions, injunctions or restraining orders issued to Respondent by the Medical Board or Courts.
- 15. Within ninety (90) days, submit written evidence of completion of 20 hours of LSBN staff approved continuing education hours to include the areas of Legal Aspects of Nursing Care, Legal Accountability, and Ethics.
- 16. Failure to comply with the above orders, receipt of an unfavorable report, or non-receipt of reports on or before the date due shall result in the immediate suspension of this registrant's license. This suspension can be imposed by action of the staff subject to the discretionary review of the Board.

I understand that this agreement is effective immediately upon signature of the Executive Director. It is also understood that this agreement does not preclude the Board of Nursing from requiring a formal hearing of my case. I further understand that should the Consent Agreement not be accepted by the Board, I agree that presentation to and consideration of the Consent Agreement, the documentary evidence and information by the Board shall not unfairly or illegally prejudice the Board or any of its members from participation in hearings or other proceedings portaining to these or other matters regarding this registrant.

Dated this and day of teb, 2001

yntis Perdue

Witness

LOUISIANA STATE BOARD OF NURSING

RRY FORBITO PEVETO

Barbara L. Morvant, MN, RN

Executive Director

Date

Initiale